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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

CYNTHIA GUTIERREZ, JOSE HUERTA, )  
SMH, RH and AH, )  
Plaintiffs, )  
vs. ) No. 16-cv-02645-SI  
SANTA ROSA MEMORIAL HOSPITAL, )  
ST. JOSEPH HEALTH and DOES 1-50, )  
Inclusive, )  
Defendants. )  
\_\_\_\_\_ )

DEPOSITION OF SHARI ANN TITUS, a witness herein,  
noticed by LAW OFFICE OF DOUGLAS C. FLADSETH, at 400  
North Tustin Avenue, Santa Ana, California, at 1:31  
p.m., on Tuesday, May 15, 2018, before Kathryn D.  
Jolley, CSR 11333.

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21 I N D E X

22 WITNESS: SHARI ANN TITUS

23 EXAMINATION BY:

PAGE

24 MR. FLADSETH

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25

1 was him. Could have been him.

2 MR. FLADSETH:

3 Q. Okay. So, I notice that there's two different  
4 kinds of reports in the emergency department. One's  
5 called the emergency department report and one is called  
6 ED summary report. Are you familiar with those things?

7 A. I know they exist in the system, yes.

8 Q. Okay. And can you tell me what the difference  
9 between the two is?

10 A. Not without looking at the actual report.

11 I mean, I do know the summary -- just in general  
12 functionality, the summary summarizes the visit.

13 Q. And when in relationship to the actual visit is  
14 the summary report generated? I mean, is it the day of  
15 the visit as soon as the patient's discharged, the  
16 summary is automatically generated by the computer, or  
17 how does that work?

18 A. There are, you know, timeframes and parameters  
19 that define when that gets printed.

20 Q. Okay. What are they?

21 A. I recall we -- I'm trying to think.

22 MR. SCHOEL: If you know it, tell him. Otherwise,  
23 don't start guessing or speculating.

24 THE WITNESS: Yeah, I don't want to guess.

25 MR. FLADSETH:

1 Q. Well, what's your understanding as to when the  
2 ED summary report is prepared?

3 A. It's typically a duration of time. It's  
4 typically set for a duration of time that they would  
5 believe that all information would be there. And so  
6 that's the piece, is that specific duration of time that  
7 it's set. It's not immediate. There is a -- It allows  
8 for a period of time for things to be completed.

9 Q. And so what goes into making up the ED summary  
10 report?

11 A. I can't speak to all of that.

12 Q. Well, do you know anything that goes into making  
13 up the ED summary report?

14 A. I've seen ED summary reports before, and  
15 typically they have, you know, documentation in them.  
16 They have other information, but I don't study them.  
17 I'm sorry. Go ahead.

18 Q. What information did they typically have?

19 A. You know, again, in viewing the report in  
20 general, it's relevant to the individual visit of the  
21 patient. So I've seen --

22 Q. Is that a computer --

23 A. Yes, it is computer-generated. It is a standard  
24 report by the vendor.

25 Q. By MEDITECH?

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1           A. Because I think that -- I guess where I'm going,  
2 I believe there's an ED summary that is an automatic, and  
3 must be what you're referring to.

4           Because the user pneumatic that you read off is not  
5 one that is an actual physical user. A user can demand  
6 print certain things. But again, when you demand print,  
7 it's printing as of this moment in time. If something is  
8 system-generated, it's given a parameter of, you know,  
9 when to generate it, and it generates at that time.

10           **Q. So do you know when, typically, the ED summary**  
11 **report would be generated?**

12           A. I think -- I think this is the one that we  
13 involved the vendor on; right? I think we went to the  
14 vendor because we were unclear as to what was the  
15 parameter and what -- you know, was it a specific window  
16 of time when that prints.

17           And I believe they shared something in a 30-day  
18 window, but it's not exact date to date.

19           **Q. Okay. Well, do you know when the 2-25-15 ED**  
20 **summary report was first generated?**

21           MR. SCHOEL: Objection. She just answered that.

22           THE WITNESS: We went to the vendor to try to get an  
23 explanation on when that would generate. We knew that  
24 there was a window of time to try to figure it out.

25           So there is a window of time, and, honestly, I am

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1 STATE OF CALIFORNIA ) ss

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3 I, Kathryn D. Jolley, CSR 11333, do hereby declare:

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5 That, prior to being examined, the witness named in  
6 the foregoing deposition was by me duly sworn pursuant to  
7 Section 2093(b) and 2094 of the Code of Civil Procedure;

8

9 That said deposition was taken down by me in  
10 shorthand at the time and place therein named and  
11 thereafter reduced to text under my direction.

12

13 I further declare that I have no interest in the  
14 event of the action.

15

16 I declare under penalty of perjury under the laws of  
17 the State of California that the foregoing is true and  
18 correct.

19

20 WITNESS my hand this 21st day of  
21 May, 2018.

22

23

  
Kathryn D. Jolley, CSR 11333

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